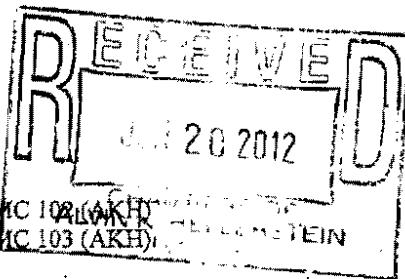
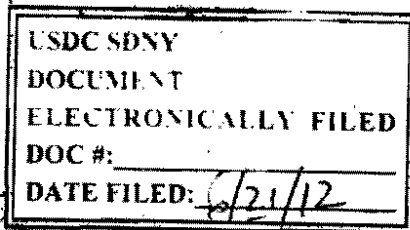


Hellerstein, J



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)  
21 MC 103 (AKH)

THIS DOCUMENT APPLIES TO ALL CASES  
IN THE WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION  
SET FORTH ON SCHEDULE A HERETO

STIPULATION AND ORDER FOR  
SUBSTITUTION OF COUNSEL

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned,

that the firm of McGuireWoods LLP, 1345 Avenue of the Americas, 7<sup>th</sup> Floor, New York, New York 10105-0106, be substituted as counsel for record for defendant Battery Park City Authority in the cases set forth on Schedule A hereto (with respect to the claims therein involving Two World Financial Center (225 Liberty Street) and/or Four World Financial Center (250 Vesey Street)), in place and in stead of Dickstein Shapiro LLP.

Dated: June \_\_, 2012

DICKSTEIN SHAPIRO LLP

McGUIREWOODS LLP

By:

Judith R. Cohen (JC 8614)  
1639 Broadway  
New York, New York 10019  
Tel.: (212) 277-6565  
Fax: (212) 277-6501

By:

Philip Gohstein (PG 4770)  
1345 Avenue of the Americas  
New York, New York 10105-0106  
Tel.: (212) 548-2100  
Fax: (212) 548-2150

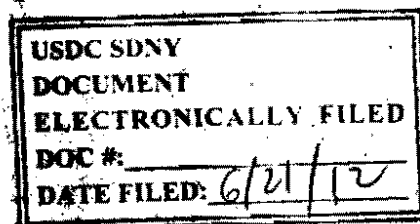
Former Attorneys for  
BATTERY PARK CITY AUTHORITY

Substituting Attorneys for  
BATTERY PARK CITY AUTHORITY

SO ORDERED:

Hon. Alvin K. Hellerstein, U.S.D.J.

6/21/12



**Schedule A**  
**21MC102**

<b>Name</b>	<b>Case No.</b>
Sanchez, Alex Anthony	05CV01091
Checo, Manuel	05CV01093
Ramirez, Iris Norma	05CV05666
Wszolkowski, Dariusz	06CV05344
Mierzejewski, Ireneusz	06CV01513
Krupinski, Leszek	06CV01519
Ropel, Waldemar	06CV01520
Kowalewski, Tadeusz	06CV01521
Pogorzelski, Jozef	06CV02748
Sobol, Andrzej	06CV04171
Zanabria, Miguel	06CV05319
Arce, Monica	06CV05323
Acosta, Ruben	06CV05335
Daikoku, Alex	06CV05342
Campuzano, Joaquin	07CV01478
Reinoso, Bolivar	07CV01516
Mnich, Marian	08CV05674

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

----- X  
IN RE: WORLD TRADE CENTER LOWER : 21 MC 102 (AKH)  
MANHATTAN DISASTER SITE LITIGATION : 21 MC 103 (AKH)  
----- X

THIS DOCUMENT APPLIES TO ALL CASES : AFFIDAVIT OF PHILIP  
IN THE WORLD TRADE CENTER LOWER : GOLDSTEIN IN SUPPORT OF  
MANHATTAN DISASTER SITE LITIGATION : SUBSTITUTION OF COUNSEL  
SET FORTH ON SCHEDULE A HERETO :  
----- X

State of New York )  
 )ss.:  
County of New York )

PHILIP GOLDSTEIN, being duly sworn, deposes and says:

1. I am a member of the Bar of the State of New York and of the United States District Court for the Southern District of New York, and am a partner with the firm of McGuireWoods LLP. I submit this affidavit pursuant to Rule 1.4 of the Local Rules of the Southern and Eastern Districts of New York, in support of the accompanying Stipulation and Order for Substitution of Counsel.

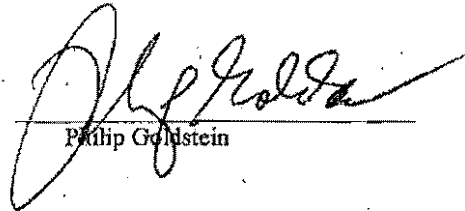
2. McGuireWoods LLP currently represents 21MC102 defendants Merrill Lynch & Co., Inc. ("Merrill Lynch") and 222 Broadway LLC and is one of the firms in the Co-Defense Liaison Counsel Group. Pursuant to the indemnification provisions in the leases for Two and Four World Financial Center, Battery Park City Authority had previously requested that Dickstein Shapiro LLP be substituted as counsel of record in the cases set forth on Schedule A to the Stipulation and Order for Substitution of Counsel, with respect to the claims in those cases involving Two and/or Four World Financial Center. That substitution of counsel was So Ordered by this Court on May 3, 2010.

3. On May 6, 2011, this Court So Ordered a substitution of counsel, wherein McGuireWoods LLP was substituted as counsel of record for defendants Merrill Lynch & Co.

and/or 222 Broadway LLC in a number of cases, including each of the cases listed on Schedule A hereto.

4. No trial date has yet been set in any of these cases.

5. As set forth above, McGuireWoods LLP already is representing Merrill Lynch in connection with all of the cases listed on Schedule A and accordingly, the substitution of counsel will not result in any prejudice or delay.

  
Philip Goldstein

Sworn to before me this  
27 day of June, 2012.

  
Notary Public

V39043117.1

EILEEN CHIN  
Notary Public, State of New York  
No. 01CH8075750  
Qualified in New York County  
Commission Expires June 10, 2014